

THE ROSEN LAW FIRM, P.A.

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[Proposed] Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
YINGLU YAO, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

vs.

FUWEI FILMS (HOLDINGS) CO., LTD., XIAOAN
HE, JUN YIN, DUO WANG, TONGJU ZHOU,

Defendants.

-----X
MEIRA RUBIN, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

vs.

FUWEI FILMS HOLDINGS CO., LTD., XIAOAN
HE, LIN TANG, MARK E. STULGA, TONGJU
ZHOU, DUO WANG, JUN YIN, MAXIM GROUP
LLC, CHARDAN CAPITAL MARKETS LLC, and
W.R. HAMBRECHT & CO., LLC,

Defendants.
-----X

Case No.: 07-CV-9416 (RJS)

CLASS ACTION

**REPLY DECLARATION OF
PHILLIP KIM IN FURTHER
SUPPORT OF NIJAT TONYAZ'
MOTION FOR LEAD PLAINTIFF
AND IN OPPOSITION TO
COMPETING MOTION FOR LEAD
PLAINTIFF**

Case No.: 07-CV-10323 (RJS)

CLASS ACTION

REPLY DECLARATION OF PHILLIP KIM

Phillip Kim hereby declares under penalty of perjury:

1. I am an attorney with the Rosen Law Firm, P.A., [Proposed] Lead Counsel in this action and have personal knowledge of the facts set forth herein. I am duly admitted to practice law in the State of New York and before this Court. I make this Reply Declaration in further support of the Motion of Nijat Tonyaz to be appointed Lead Plaintiff and in opposition to the competing motion for lead plaintiff.

2. Attached hereto as Exhibit 1 is a true and correct copy of class member Jerome Sahlman's PSLRA certification setting forth his purchase in FFHL's Initial Public Offering.

3. Mr. Sahlman has agreed to be a named plaintiff in Mr. Tonyaz' prospective consolidated amended complaint and to serve as class representative.

New York, New York

Executed: January 14, 2008

/s/ Phillip Kim
Phillip Kim

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of January 2008, a true and correct copy of the foregoing REPLY DECLARATION OF PHILLIP KIM IN FURTHER SUPPORT OF NIJAT TONYAZ' MOTION FOR LEAD PLAINTIFF AND IN OPPOSITION TO COMPETING MOTION FOR LEAD PLAINTIFF was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim